

**IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT IN AND FOR
PALM BEACH COUNTY, FLORIDA**

GRAHAM RANDALL,)	CASE NO.:
)	
Plaintiff,)	
)	
vs.)	
)	
MAR-A-LAGO CLUB,)	
AARON FULLER, and,)	
BOGDAN BOEREAN,)	
)	
Defendant.)	
_____	/	

VERIFIED COMPLAINT

1. Plaintiff, GRAHAM RANDALL, hereby sues Defendant, MAR-A-LAGO CLUB, for violations of his rights under the Florida Civil Rights Act of 1992, §760.01, Fla. Stat., *et seq.* (hereinafter “FCRA”) because he was retaliated against after he engaged in protected activity by participating in a sexual harassment investigation he initiated when two female employees who reported to him complained of sexual harassment against them by two of Defendant’s Mar-a-Lago Club high level managers, the Food and Beverage Director, Aaron Fuller and the Executive Chef, Bogdan Boerean. Plaintiff also sues Defendants Fuller and Boerean, for tortious interference with Plaintiff’s employment, because, subsequently to Plaintiff exposing and opposing their sexual harassment against Plaintiff’s two female employees, Fuller and Boerean retaliated against him by terminating Plaintiff’s employment for wholly pretextual reasons. Plaintiff also sues MAR-A-LAGO for violations of his rights under the Florida private sector Whistleblower Act, §448.101 *et seq.*, which protects employees from retaliation for reporting a violation of the law, including sexual harassment of others.

JURISDICTION AND VENUE

2. This is an action for damages in excess of \$15,000, exclusive of attorney's fees and costs.

3. Venue is proper in this Court, because all acts complained of occurred in Palm Beach County, Florida.

PARTIES

4. Plaintiff is a natural person and was employed by the Defendant in Palm Beach County, Florida.

5. Defendant MAR-A-LAGO is a foreign limited liability company, with its principal place of business in Palm Beach County, Florida. Defendant MAR-A-LAGO was, at all times relevant to this claim, Plaintiff's "employer" as that term is defined by the FCRA, §760.01 *et seq.* Defendant FULLER is a natural person who is residing in Palm Beach County, Florida. Defendant BOEREAN is a natural person who is residing in Palm Beach County, Florida and is believed to still be employed by the Defendant.

EXHAUSTION OF ADMINISTRATIVE REMEDIES

6. Prior to filing this action, Plaintiff filed a charge of employment discrimination with the Equal Employment Opportunity Commission ("EEOC") and Florida Commission on Human Relations ("FCHR") on or about November 16, 2017, attached hereto as **Exhibit 1**. More than 180 days have elapsed since the charges were filed, and the FCHR has not made any determination on the merits of the charges. Accordingly, Plaintiff is authorized by law to file this action and is filing same within four (4) years of the adverse actions complained of.

FACTS

7. Plaintiff, at all times relevant hereto, was employed by Defendant MAR-A-LAGO as an Executive Pastry Chef from on or about September 20, 2012, until he was terminated on or about October 24, 2017. Plaintiff performed his work very well and was never disciplined.

8. On or about the end of April 2017, Ms. Chelsea Braswell, a young Pastry Chef, complained to Plaintiff, who was her direct supervisor, that Defendants Fuller and Bogdan Boerean, were engaging in unwelcome and inappropriate sexual harassment of her. Ms. Braswell showed Plaintiff sexually offensive text messages Mr. Fuller was sending her, including “show me your boobs” or words to that affect. Ms. Braswell, then, a young women twenty (20) years of age, explained to Plaintiff she felt very demeaned and intimidated by Mr. Fuller because of his higher position. Keep in mind Mr. Fuller was a married man about forty (40) years of age.

9. On the same day as Ms. Braswell, Ms. Elisa Cordon, another young Pastry Chef, also complained to Plaintiff about similar sexual harassment issues by Mr. Boerean. Ms. Cordon also explained to Plaintiff she felt intimidated by Mr. Boerean’s demeaning and offensive sexually harassing behaviors towards her. Ms. Cordon was a young woman, about twenty three (23) years of age at the time, and expressed how intimidated she felt by Mr. Boerean, a married man in his thirties, due to his high level position with the Defendant.

10. Determining Mr. Fuller’s and Mr. Boerean’s actions to be in violation of company policy, and that their behaviors were in violation of law that prohibits sexual harassment in the work place, Plaintiff referred Ms. Braswell and Ms. Cordon to the Human Resources Department. Mr. Fuller and Mr. Boerean both held higher positions than Plaintiff and Mr. Randall did not have the authority to discipline them.

11. Plaintiff was interviewed about these complaints on two separate occasions by Ms. Janine Gill a/k/a Janine Valez, Human Resources Director, hence he participated in the investigation. Plaintiff expressed his concern about his bosses interfering with his employees and their conduct against two young female employees who were intimidated by their actions. During one of these interviews, Ms. Gill told Plaintiff that this was a situation that could have both of these senior managers terminated.

12. Ms. Gill a/k/a Ms. Valez subsequently followed up with Plaintiff in person after she concluded her investigation and told him that Mr. Fuller and Mr. Boerean received written reprimands. Both Fuller and Boerean subsequently apologized to the Plaintiff for their conduct, and thanked him for saving their careers, because Plaintiff had told Ms. Gill during the investigation that this misconduct seemed out of character for the two men.

13. About six (6) months following the conclusion of the investigation, on or about October 24, 2017, Fuller and Boerean, with Ms. Gill present, terminated the Plaintiff from his employment; the new “season” had just started at Mar-a-Lago at the beginning of October 2017, and Plaintiff had insisted that the two young women that had made the complaints to Plaintiff be returned to their employment because he did not want to be a part of any retaliation against them. Plaintiff contends that he was retaliated against for his opposition to Fuller and Borean’s conduct against the young women and for insisting that they be allowed to return to work there at the start of the season.

14. Defendant’s reason for terminating Plaintiff, economic losses the club was taking because of seasonal cancellations by charitable organization of events at Mar-a-Lago Club, is pretextual because Mar-a-Lago has profited immensely from President Donald J. Trump’s election. While some charities initially canceled events at Mar-a-Lago, this loss has been made up by other income flowing into the Club. In addition, on belief and information, Defendant Mar-a-Lago

requested more foreign employees in 2017 and 2018 to fill its staffing needs. Further, Defendants did not offer the Plaintiff an opportunity to take a demotion from Executive Pastry Chef to Pastry Chef, several of whom continued to be employed by the Defendant following Plaintiff's termination.

COUNT I: FCRA RETALIATION

15. Plaintiff incorporates the allegations set forth in ¶¶1-13.

16. The Defendant retaliated against the Plaintiff because Plaintiff engaged in activities protected by the law, including participating in a sexual harassment investigation of the two female employees who complained to him of sexual harassment by Fuller and Boerean.

17. Plaintiff was damaged as a result of Defendant's retaliation sustaining lost wages, benefits, and mental and physical anguish.

WHEREFORE, Plaintiff respectfully requests the following relief against Defendant:

- a) An award of damages, including lost wages and benefits;
- b) Compensatory damages for mental anguish; loss of dignity and reputation; inconvenience; loss of the enjoyment of life;
- c) Attorney's fees and costs;
- d) Equitable relief including a reinstatement to his position prior to termination, and retraining if needed;
- e) Any other relief deemed just and proper, including declaratory relief that his rights were violated by the Defendant.

COUNT II: PRIVATE SECTOR WHISTLEBLOWER ACT CLAIM

18. Plaintiff brings this claim against Defendant Mar-a Lago Club for violations of his rights pursuant to the Florida Private Sector Whistleblower Act, §§448.101, Fla. Stat. *et seq.*

19. Plaintiff incorporates the allegations set forth in ¶¶1-13.

20. Plaintiff engaged in protected activity under §448.102(3), Fla. Stat., when he opposed conduct on the part of Fuller and Boerean that he reasonably believed was against the law, and also when participated in a sexual harassment investigation of two employees who complained to him that they were being sexually harassed. Plaintiff “objected to, or refused to participate in, any activity, policy, or practice of the employer which is in violation of a law, rule, or regulation.”

21. After Plaintiff engaged in protected activity by opposing and participating in a sexual harassment investigation of Fuller and Boerean, Defendant terminated his employment.

22. Plaintiff’s protected activity and the adverse employment action taken against him are causally related.

WHEREFORE, Plaintiff respectfully requests that this Court, in accordance with §448.103, Fla. Stat.:

- A. Award Plaintiff lost wages, benefits, and other economic damages, as appropriate;
- B. Reinstatement by a preliminary and permanent injunction or, in lieu thereof, front pay;
- C. Award Plaintiff compensatory damages;
- D. Award Plaintiff a reasonable attorneys’ fees and his costs; and,
- E. Any other relief deemed just and proper, including permitting future amendment to claim punitive damages for the Defendant’s wilful and intentional retaliation against him.

COUNT III: TORTIOUS INTERFERENCE v. Defendant FULLER

23. Plaintiff incorporates the allegations set forth in ¶¶1-13.

24. Defendant FULLER, acting outside the course and scope of his employment,

without justification, and for improper, personal and vindictive purposes, to wit, to punish and to humiliate the Plaintiff for having exposed his sexually harassing behaviors towards young female employees to the Human Resources Department, and punish Plaintiff for his disclosures and participation in the investigation. Defendant FULLER was fully aware that Mr. Randall was a part of the investigation conducted by human resources regarding the complaints made against him.

25. As a result of said conduct, Plaintiff was terminated from his employment, and suffered damages.

WHEREFORE, Plaintiff respectfully requests that this Court:

- A. Award Plaintiff compensatory damages for lost wages and benefits, mental anguish, humiliation, loss of reputation, loss of the enjoyment of life, and pain and suffering; and,
- B. Award Plaintiff the costs of this action.

COUNT IV: TORTIOUS INTERFERENCE v. Defendant BOEREAN

26. Plaintiff incorporates the allegations set forth in ¶¶1-13.

27. Defendant BOEREAN, acting outside the course and scope of his employment, without justification, and for improper, personal and vindictive purposes, to wit, to punish and to humiliate the Plaintiff for having exposed his sexually harassing behaviors towards young female employees to the Human Resources Department, and punish Plaintiff for his disclosures and participation in the investigation. Defendant BOEREAN was fully aware that Mr. Randall was a part of the investigation conducted by human resources regarding the complaints made against him.

28. As a result of said conduct, Plaintiff was terminated from his employment, and suffered damages.

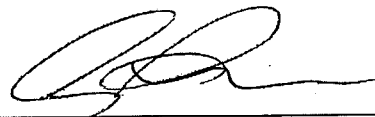
WHEREFORE, Plaintiff respectfully requests that this Court:

- A. Award Plaintiff compensatory damages for lost wages and benefits, mental anguish, humiliation, loss of reputation, loss of the enjoyment of life, and pain and suffering; and,
- B. Award Plaintiff the costs of this action.

JURY DEMAND

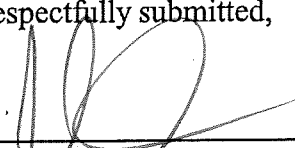
PLAINTIFF DEMANDS A JURY TRIAL ON ALL ISSUES SO TRIABLE.

I DECLARE UNDER PENALTY OF PERJURY that the foregoing factual allegations are true and correct to the best of my knowledge and belief.



GRAHAM RANDALL

Respectfully submitted,



ISIDRO M. GARCIA
Florida Bar No. 437883
GARCIA LAW FIRM, P.A.
120 South Olive Ave., Suite 401
West Palm Beach, FL 33401
Telephone: (561) 832-7732
Telecopier: (561) 832-7137
E-mail: isidrogarcia@garcialaborlaw.com
COUNSEL FOR PLAINTIFF

Date: January 24, 2019

GARCIA LAW FIRM, P.A.

Telecopier: (561) 832-7137

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DATE: November 16, 2017

TOTAL NUMBER OF PAGES (including this page): 5

PLEASE DELIVER THE FOLLOWING PAGES IMMEDIATELY TO:

NAME: Michael Farrell and Dante Bonner

LOCATION: 305/808-1855 and 850/487-1007

FROM: Isidro Garcia

REFERENCE: Graham Randall vs. Mar-a-Lago Club, LLC

ENCLOSED: Please see letter with Charge of Discrimination.

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120 South Olive Ave., Suite 401, West Palm Beach, Florida, 33401

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GARCIA LAW FIRM, P.A.

Isidro M. Garcia

November 16, 2017

VIA FACSIMILE AND
CERTIFIED MAIL

Michael Farrell, District Director FAX 305/808-1855
EEOC - Miami District Office
Miami Tower
100 S.E. 2nd Street, Suite 1500
Miami, FL 33131

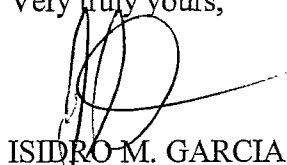
Dante Bonner, Customer Service/Intake Manager FAX 850/487-1007
Florida Commission on Human Relations
4075 Esplanade Way, Room 110
Tallahassee, FL 32399-7020

Re: **Graham Randall vs. Mar-a-Lago Club, LLC**

Dear Mr. Farrell and Mr. Bonner:

Enclosed please find a Charge of Discrimination on behalf of my client, **Graham Randall**. Please file same and call if you need any further information or have any questions. This charge is **not** being dual filed, but is filed separately with each of your agencies. I am submitting this joint letter to you so that you are aware that the charge is being filed independently with each agency.

Very truly yours,



ISIDRO M. GARCIA

Enclosure

Copy without enclosure: Client

www.garcialaborlaw.com

[e-mail:isidrogarcia@garcialaborlaw.com](mailto:isidrogarcia@garcialaborlaw.com)

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CHARGE OF DISCRIMINATION This form is affected by the Privacy Act of 1974; See Privacy Act Statement before completing this form.		AGENCY <input type="checkbox"/> FEPA <input type="checkbox"/> EEOC	CHARGE NUMBER
Florida Commission on Human Relations and EEOC State or local Agency, if any			
NAME (Indicate Mr., Ms., Mrs.) MR. GRAHAM RANDALL		HOME TELEPHONE (Include Area Code) 561-727-7554	
STREET ADDRESS 12309 51st Court North		CITY, STATE AND ZIP CODE WEST PALM BEACH, FL 33411	DATE OF BIRTH 05-09-1970
NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (If more than one list below.)			
NAME MAR A LAGO CLUB LLC		NUMBER OF EMPLOYEES, MEMBERS +150	TELEPHONE (Include Area Code) 561-832-2600
STREET ADDRESS CITY, STATE AND ZIP CODE C/O THE TRUMP ORGANIZATION 725 FIFTH AVENUE NEW YORK, N.Y. 10022			
NAME		TELEPHONE (Include Area Code)	
STREET ADDRESS CITY, STATE AND ZIP CODE		COUNTY	
CAUSE OF DISCRIMINATION BASED ON (Check appropriate box(es)) RACE COLOR SEX RELIGION XRETALIATION AGE DISABILITY		DATE DISCRIMINATION TOOK PLACE EARLIEST LATEST 10/24/2017	

I. INTRODUCTORY STATEMENT

I WAS EMPLOYED AS EXECUTIVE PASTRY CHEF FOR THIS EMPLOYER FROM SEPTEMBER 20, 2012 UNTIL I WAS FIRED ON OCTOBER 24, 2017. I PERFORMED MY WORK VERY WELL AND WAS NEVER DISCIPLINED. I WAS TOLD THAT I WAS BEING LAID OFF DUE TO SEASONAL CANCELLATIONS AND THAT THE CLUB EXPECTED TO LOSE REVENUES OF \$2.5 MILLION, THEREFORE I HAD TO BE RELEASED. HOWEVER, I BELIEVE THAT THIS IS NOT THE REAL REASON FOR MY LAYOFF SINCE THE CLUB REQUESTED AN INCREASE IN THE NUMBER OF GUEST WORKERS FROM ABROAD FROM THE DEPARTMENT OF LABOR FOR THIS SEASON AND THIS INCLUDES ADDITIONAL PASTRY CHEFS.

II. EMPLOYER'S STATED REASON FOR DISCRIMINATORY TREATMENT.

THE EMPLOYER, THROUGH HR MANAGER JANINE GILL, FOOD AND BEVERAGE DIRECTOR AARON FULLER AND EXECUTIVE CHEF BOGDAN BOEREAN MET WITH ME AND TOLD ME THAT I WAS BEING LAID OFF DUE TO ECONOMIC LOSSES THE CLUB WAS TAKING BECAUSE OF SEASONAL CANCELLATIONS OF CHARITABLE ORGANIZATION EVENTS.

III. DISCRIMINATION STATEMENT

I BELIEVE I HAVE BEEN DISCRIMINATED/RETALIATED AGAINST BECAUSE OF MY OPPOSITION AND PARTICIPATION IN A SEXUAL HARASSMENT INVESTIGATION OF SEVERAL EMPLOYEES WHO COMPLAINED TO ME OF THE ACTIONS AGAINST THEM BY MR. FULLER AND MR. BOEREAN. PASTRY CHEF **CHELSEA BRASWELL** APPROACHED ME AND WAS VERY UPSET ABOUT BEING PRESSURED BY MR. FULLER; SHE SHOWED ME SEXUALLY OFFENSIVE TEXTS FROM MR. FULLER, INCLUDING "SHOW ME YOUR BOOBS" OR WORDS TO THAT EFFECT AND EXPLAINED SHE FELT VERY DEMEANED AND INTIMIDATED BY FULLER BECAUSE OF HIS HIGHER POSITION. CHELSEA WAS THEN A YOUNG WOMAN, 20 YEARS OF AGE, FULLER WAS A MARRIED MAN ABOUT 40 YEARS OF AGE.

ANOTHER PASTRY CHEF, **ELISE CARBON**, ALSO COMPLAINED TO ME ABOUT SIMILAR SEXUAL HARASSMENT ISSUES BY MR. BOEREAN. ELISE WAS A YOUNG WOMAN ABOUT 23 YEARS OLD, BOEREAN A MARRIED MAN IN HIS THIRTIES. DETERMINING THIS WAS A VIOLATION OF COMPANY POLICY, AND MY UNDERSTANDING OF THE LAW THAT PROHIBITS SEXUAL HARASSMENT IN THE WORK PLACE, I REFERRED BOTH OF THESE WOMEN TO H.R. FULLER AND BOEREAN HELD HIGHER POSITIONS THAN ME, SO I COULD NOT DISCIPLINE THEM. I WAS INTERVIEWED BY MS. GILL FROM H.R. AND EXPRESSED MY DISAPPOINTMENT AND SURPRISE THAT MY BOSSES WOULD ENGAGE IN THIS TYPE OF CONDUCT AND INTERFERE WITH MY EMPLOYEES. THE REFERRAL AND MY CONVERSATIONS WITH H.R. OCCURRED ON OR ABOUT APRIL, 2017. THE HR DIRECTOR, MS. GILL, LATER CALLED ME TO ASK IF I NEEDED ANYTHING ELSE AND THAT FULLER AND BOEREAN HAD RECEIVED WRITTEN REPRIMANDS. I BELIEVE THAT MR. FULLER AND MR. BOEREAN WAITED SUFFICIENT TIME TO COVER THEIR TRACKS, AND THEN RETALIATED AGAINST ME FOR OPPOSITION TO THEIR SEXUAL HARASSMENT OF MY SUBORDINATE FEMALE EMPLOYEES. I BELIEVE THAT I ALSO LOST ANOTHER FEMALE PASTRY CHEF NAMED TARA WILLIAMSON AND SARAH (LAST NAME UNKNOWN) BECAUSE OF SIMILAR ISSUES BUT THEY DID NOT COMPLAIN TO ME OR AS FAR AS I KNOW TO H.R.

IV. RELIEF SOUGHT

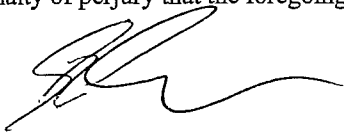
I SEEK LOST WAGES AND BENEFITS FROM THE DATE OF TERMINATION TO THE DATE OF TRIAL, LIQUIDATED DAMAGES, REINSTATEMENT TO MY EMPLOYMENT WITH INJUNCTIVE RELIEF OR FRONT PAY IN LIEU OF REINSTATEMENT, COMPENSATORY DAMAGES FOR MENTAL ANGUISH, PHYSICAL PAIN AND SUFFERING AND PUNITIVE DAMAGES, PLUS ATTORNEY'S FEES AND COSTS.

I do not want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or telephone number and cooperate fully with them in the processing of my charge in accordance with their procedures.

NOTARY - When necessary for State and local Requirements)

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

I declare under penalty of perjury that the foregoing is true and correct.



November 16, 2017

Date

Charging Party (Signature)

SIGNATURE OF COMPLAINANT

SUBSCRIBED AND SWORN TO ME THIS DATE
(Day, month, and year)

* * * Communication Result Report (Nov. 16. 2017 1:33PM) * * *

1}
2}

Date/Time: Nov. 16. 2017 1:30PM

File No. Mode	Destination	Pg(s)	Result	Page Not Sent
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E. 3) No answer	E. 4) No facsimile connection
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NAME: Michael Ferrell and Dante Bonner

LOCATION: 305/808-1855 and 850/487-1007

FROM: Isidro Garcia

REFERENCE: Graham Randa III vs. Mar-a-Lago Club, LLC

ENCLOSED: Please see letter with Charge of Discrimination.

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* * * Communication Result Report (Nov. 16. 2017 1:57PM) * * *

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Reason for error

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Collect on Delivery Restricted Delivery
Insured Mail
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4. Is delivery address different from item 1? Yes
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100 S.E. 2nd St., Ste. 1500
Miami, FL 33131

2. Article Number (Transfer from service label)
7015 1730 0002 0063 7596

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✓ Adult Signature Restricted Delivery
✓ Certified Mail®
✓ Certified Mail Restricted Delivery
Collect on Delivery
Collect on Delivery Restricted Delivery
Insured Mail
Insured Mail Restricted Delivery (over \$500)

4. Is delivery address different from item 1? Yes
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1. Article Addressed to:
Dante Bonner
4075 Esplanade Way Rm. 110
Tallahassee, FL 32399-7020



9590 9402 1403 5329 7763 20

2. Article Number (Transfer from service label)
7015 1730 0002 0063 7602

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COMPLETE THIS SECTION ON DELIVERY

A. Signature
X [Signature]
B. Received by (Printed Name)
C. Date of Delivery
12-1-17
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✓ Adult Signature
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Collect on Delivery Restricted Delivery
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Domestic Return Receipt

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- Complete items 1, 2, and 3.
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Michael Farrell
100 S.E. 2nd St., Ste. 1500
Miami, FL 33131



9590 9402 1403 5329 7763 13

2. Article Number (Transfer from service label)
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X [Signature]
B. Received by (Printed Name)
C. Date of Delivery
11-22-17
D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

3. Service Type
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✓ Certified Mail Restricted Delivery
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Domestic Return Receipt

Service provides the following benefits:

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delivery or attempted

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/ the Postal Service™

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available for

available for purchase
However, the purchase
does not change the
mailpiece included with

with a proper
mailpiece, you may request

which provides a record
of the recipient's signature).
copy return receipt or an
a hardcopy return receipt,
1, Domestic Return
mail 3811 to your mailpiece;

IMPORTANT: Save this receipt for your records.

(Reverse) PSN 7530-02-000-9047

RANDALL

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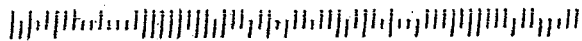


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Certified Mail label).
mailpiece.
delivery or attempted

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available for purchase
However, the purchase
does not change the
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with a proper
mailpiece, you may request

which provides a record
of the recipient's signature).
copy return receipt or an
a hardcopy return receipt,
1, Domestic Return
mail 3811 to your mailpiece;

IMPORTANT: Save this receipt for your records.

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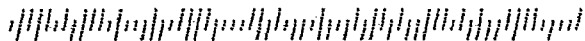


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